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Youths and Adults**

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Operated by  
Helen Keller Services  
for the Blind

February 4, 2011

Federal Communications Commission  
Marlene H. Dortch, Secretary  
Washington, DC 20554

Dear Commissioner,

On behalf of the Helen Keller National Center (HKNC), I want to thank you and the FCC staff for all your hard work and the excellent job you have done during this entire process. It is clear that the Commission has given a great deal of consideration to the comments and recommendations previously submitted by the interested parties. HKNC is a member organization of the National Coalition on Deaf-Blindness (NCDB) which is submitting a comprehensive response to the recently published NPRM. In addition to HKNC's support of the recommendations in the NCDB's response, there are several additional points I would like to make regarding the ability of the EDPs to meet the needs of people who are Deaf-Blind in their states and whether or not the model being proposed will have the flexibility to allow for consumer choice.

In Paragraph 9, the Commission correctly points out that "there are approximately 45 such state programs (EDPs) that vary widely in their eligibility criteria, types of equipment distributed, method of providing assistance, level of training, and maintenance, upgrades and repairs for distributed equipment."

In Paragraph 10, the NPRM goes on to propose that "if a state has an established EDP program that applies for and is selected to receive NDBEDP funding, the Commissioner proposes that such program become the sole authorized entity for the state to receive compensation from the TRS Fund for the distribution of equipment to that state's residents who are Deaf-Blind residents for the duration of the pilot program."

In Paragraph 29, recognizing "the diverse needs and preference of the deaf-blind population in a world of rapidly evolving technologies," the NPRM states that it is the intent of the Commission to "assess both the demand for the varied technologies and to make necessary adjustments in the types of equipment covered under this program."

Paragraphs 9, 10 and 29, taken together, go to the heart of our concern- that being the capability of the state EDPs to use the funds to produce the maximum impact on the lives of individuals who are Deaf-Blind in their states. As a national program serving people who are Deaf-Blind throughout the country, we, too, are aware of the wide range in the effectiveness of the various EDPs in terms of their knowledge of the available technology and, most importantly, how to properly train the consumers in the use of the equipment. Comments submitted by the

American Association of the Deaf-Blind (AADB) and the American Council of the Blind (ACB) raised concerns on the part of consumers with the current telephone relay system (TRS) program.

The Commission is to be commended for identifying, in Paragraph 10, a comprehensive list of "factors that need to be considered in determining whether to grant certification of a local program." But HKNC has serious concerns as to how well the Commission will be able to evaluate the applicants' abilities in the areas listed in the NPRM. We urge the Commission to allow for meaningful input from consumers and/or people with expertise in deaf-blindness when assessing whether or not an agency is qualified to serve as a distribution center.

As part of its overall effort to train professionals, HKNC offers a weeklong seminar titled "Adaptive Technology Training for Teaching Deaf-Blind Individuals." The audience is typically comprised of technology trainers who have worked with individuals who are blind. The focus of the training is twofold; 1) to demonstrate the newest available technology, and 2) to show them how to teach the use of the technology to a learner who is deaf-blind. When asked to provide feedback on the training, the participants invariably comment on the fact that they were not fully up to date on the technology used by deaf-blind people and, while they had been teaching technology for years, they never realized the number of things that had to be considered when working with a person who is deaf-blind-e.g., how and when to use an interpreter; how to position yourself, the student and the interpreter to make the communication flow smoothly; if the instructor is blind or significantly visually impaired, how does he employ the hand over hand style of instruction when the learner cannot hear your verbal instructions and needs his hands for communication? I use this to illustrate that while some EDPs may think that they know how to work with individuals who are deaf-blind, this might not be the case.

Among the barriers people who are Deaf-Blind face in their attempt to achieve independence is the critical shortage of qualified personnel trained to work with them. Recognizing this, HKNC strongly recommends that consumers have the right to receive training from another agency, whether in-state or out of state, if they feel the EDP is not meeting their needs.

In paragraphs 54 and 55, the NPRM addresses the issue of whether or not an Advisory Body is needed. HKNC agrees with the recommendation of the NCDB that the Commission create such a body to evaluate consumer experiences during the pilot phase to assist in the evaluation of the model.

My final comment deals with the *Outreach and Education about the NDBEDP* which is addressed in paragraphs 43 and 44. Here again, I will offer the experience of HKNC to help you frame your thinking on whether or not to "set aside a portion of the \$10 million for a contract that would be awarded to a

national organization to conduct outreach, which we believe may be necessary to facilitate the efficient and effective distribution of equipment for use by people who are deaf-blind."

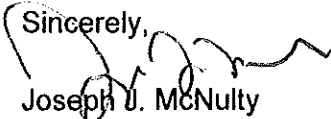
As noted in the comments submitted by the NCDB, the majority of people who are Deaf-Blind are most likely not currently an active case in the Vocational Rehabilitation system. The latest data from the Research and Training Center on Blindness and Low Vision at Mississippi State University puts the number of people in the U.S. with combined vision and hearing loss at over 1.2 million with the greatest percentage of the population in the 55 and over age group. Outreach attempts will require interacting with a number of service delivery systems.

In addition to identifying where the people are living, you will also face the significant challenge of presenting the information on the language level and in the format that makes it accessible. At the request of the New York State Commission for the Blind and Visually Handicapped (CBVH), HKNC is presently conducting a state-wide needs assessment of individuals who are Deaf-Blind. The information, collected from consumers, their families and service providers, will be used in the development of CBVH's strategic plan. HKNC has had to employ a number of strategies when soliciting information from the deaf-blind consumers to ensure that they have sufficient opportunity to express their feelings and share their needs. Depending on the person's language level and preferred form of communication, surveys were mailed in print, large print and Braille format; interviews were conducted over the telephone via direct communication, relay or VRS; face to face individual interviews were conducted; and focus group interviews were held in select locations across the state.

My reason for sharing these experiences is to point out that agencies and programs that have not had significant experience working with people who are Deaf-Blind are not likely not to be able to accomplish what the FCC will be requiring of them.

In closing, let me again thank and compliment you on the level of professionalism with which the Commission has conducted this process. If there is any additional information you might need, please don't hesitate to contact me.

Sincerely,



Joseph J. McNulty  
Executive Director, HKNC  
JJMcN/sr